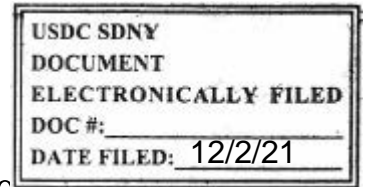


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November 30, 2021

Via ECF

The Honorable Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

The motions deadline is hereby
ADJOURNED to February 14,
2022. SO ORDERED.

A handwritten signature in black ink, appearing to read "Alison J. Nathan".

12/2/21

**RE: United States v. James Bell
Criminal Docket 21 CR 280 (AJN)**

Dear Judge Nathan:

As the Court is aware I was assigned as new counsel for Mr. Bell on November 19, 2021. It is my understanding from meeting with my client over the weekend and speaking to the Government that the deadline for motion submission is December 1, 2021. Prior counsel has provided me with the discovery to the case after my appointment, however I have not had a meaningful opportunity to review the discovery nor go over it with Mr. Bell. I have also not had the opportunity to have meaningful discussions about the case with any of the co-counsel in the case. I spoke to the Government regarding seeking an extension of the motion schedule and they have no objection to me seeking an extension in order to educate myself on the case and familiarize myself with the discovery and all the legal issues in the case.

For the above-expressed reasons, I would request that the motion deadline be extended to the third week of February if it so pleases the Court. I have several

out of District at risk death-eligible cases and a trial schedule as well but this will allow me more than enough time to review the discovery and legal issues.

Thank you for your time and consideration in this matter.

Sincerely,
Kenneth J. Montgomery

Kenneth J. Montgomery, Esq.